1 2 3 4 5 6 7 8	GARMAN TURNER GORDON LLP GERALD M. GORDON Nevada Bar No. 229 E-mail: ggordon@gtg.legal JARED M. SECHRIST Nevada Bar No. 10439 E-mail: jsechrist@gtg.legal 7251 Amigo St., Suite 210 Las Vegas, Nevada 89119 Tel: (725) 777-3000 / Fax: (725) 777-3112  Attorneys for Tecumseh—Infinity Medical Receivable Fund, LP	MICHAEL D. NAPOLI, ESQ.  Pro hac vice  AKERMAN LLP  2001 Ross Avenue, Suite 3600  Dallas, Texas 75201  Tel: (214) 720-4360 / Fax: (214) 720-8116  ARIEL E. STERN, ESQ.  Nevada Bar No. 8276  AKERMAN LLP  1635 Village Center Circle, Suite 200  Las Vegas, Nevada 89134  Tel: (702) 634-5000 / Fax: (702) 380-8572  Email: ariel.stern@akerman.com
10	IN THE UNITED STATES	S BANKRUPTCY COURT
11	FOR THE DISTR	ICT OF NEVADA
12	In re:	Case No. 21-14486-abl
13	INFINITY CAPITAL MANAGEMENT, INC.	Chapter 7
14	Debtor.	
15 16	HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND INTERNATIONAL SP,	Adversary Case No. 21-01167-abl
17 18	Plaintiff, v.	ERRATA TO JOINT PRE-TRIAL STATEMENT
19	TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP,	
20	Defendant.	
21	HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND	
22	INTERNATIONAL SP, et al.,	
23	Counter-Claimant	
24	V.	
25	TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP, et al.,	
26	Counter-Defendants.	
27		
28		

Garman Turner Gordon Attorneys at Law 7251 Amigo Street, Ste. 210 Las Vegas, NV 89119 725-777-3000

1 Tecumseh-Infinity Medical Receivable Fund, LP ("Tecumseh"), by and through its 2 counsel, the law firm of Garman Turner Gordon, LLP, hereby submits its errata to the Joint Pre-3 Trial Statement [ECF No. 266] (the "Joint Pre-Trial Statement"), filed on August 15, 2023. 4 The filing of this errata is necessary because Exhibit B to the Joint Pre-Trial Statement was 5 erroneously submitted. The corrected exhibit is attached hereto. Dated this 18<sup>th</sup> day of August 2023. 6 7 GARMAN TURNER GORDON LLP 8 By: /s/Jared M. Sechrist GERALD M. GORDON, ESQ. 9 JARED M. SECHRIST, ESQ, 7251 Amigo St., Suite 210 10 Las Vegas, Nevada 89119 11 -and-12 MICHAEL D. NAPOLI, ESQ. 13 Pro hac vice AKERMAN LLP 14 2001 Ross Avenue, Suite 3600 15 Dallas, Texas 75201 Tel: (214) 720-4360 / Fax: (214) 720-8116 16 ARIEL E. STERN, ESQ. 17 Nevada Bar No. 8276 AKERMAN LLP 18 1635 Village Center Circle, Suite 200 19 Las Vegas, Nevada 89134 Tel: (702) 634-5000 / Fax: (702) 380-8572 20 Attorneys for Tecumseh–Infinity Medical 21 Receivable Fund, LP 22 23 24 25 26 27 28

Garman Turner Gordon Attorneys at Law 7251 Amigo Street, Ste. 210 Las Vegas, NV 89119 725-777-3000

#### **EXHIBIT B**

Defendant Tecumseh-Infinity Medical Receivables Fund, Lp's Trial Exhibit List

**EXHIBIT B** 

#### Case 21-01167-abl Doc 267 Entered 08/18/23 15:18:41 Page 4 of 13 **DEFENDANT'S TRIAL**

#### **EXHIBITS**

EXHIBITS		Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.			<b>BK</b> 21-14486-abl
		HASelect v. Tecumseh			<b>Adv</b> 21-01167-abl
Offered	Admitted	Identification		Description	Offers
					Objections
				_	Rulings
		ш	Witness		
-		#	Witness	T' (D' (1D : 11	Exceptions
		A-1 A-2		List of Disputed Receivables  List of Disputed Receivables Overlap	
-		A-Z		Sub-Advisory Agreement Tecumseh-Infinity Medical	
				receivables Fund LP dated 6/18/2020 (TEC002976 -	
		A-3		002984)	
		A-3		Tecumseh-Infinity MR Fund List of Receivables for	
		A-4		Series-1/Intake B (TEC002985 - 002987)	
		71 7		Tecumseh-Infinity MR Fund - Analyed List of	
				Receivables for Series 1/Intake F (Batch 6, 7 & 8)	
		A-5		(TEC007067 - 007071)	
				Tecumseh-Infinity MR Fund - Analyzed List of	
				Receivables for Series 1/Intake I (Batch 12 A&B)	
		A-6		(TEC007072 - 007087)	
				Tecumseh-Infinity MR Fund - Analyzed List of	
				Receivables for Series 1/Intake J (Batch 14-A)	
		A-7		(TEC007088 - 007094)	
				Excerpts from Nevada State Bank Acct. 6375	
				Infinity Capital Management re 1-F, 1-I & 1-J	
		A-8		Receivables	
				Tecumseh-Infinity MR Fund List of Receivables for	
				Series-1/Intake K (Batch DP-1 (TEC003110 -	
		A-9		003113))	
				9/22/2020 Tecumseh Receivables Purchase Order	
		A-10		PO#1-F-9-15 (TEC007271)	
		A 11		10/12/2020 Tecumseh Receivables Purchase Order	
		A-11		PO# 1-I-10-18 (TEC007281) Tecumseh – Infinity MR Fund - List of Receivables for	
				Series-1/Intake I (Batch 13) PO# 1-I-10-18	
		A-12		(TEC007282 - 007301)	
<del>                                     </del>		/A-12		10/23/2020 Tecumseh Receivables Purchase Order	
		A-13		PO# 1-J-10-19 (TEC007307)	
				Tecumseh – Infinity MR Fund - List of Receivables for	
				Series-1/Intake J (Batch 14-B) PO# 1-J-10-19	
		A-14		(TEC007309 - 007312)	
				Tecumseh – Infinity MR Fund - List of Receivables for	
				Series-1/Intake J (Batch 14-C) PO# 1-J-10-19	
		A-15		(TEC007313 - 007320)	
				10/30/2020 Tecumseh Receivables Purchase Order	
		A-16		PO# 1-K-10-20 (TEC007321)	
				Reconciliation to Tecumseh's BofA Account	
		A-17		Statements (TEC0003191 - 003287)	
				10/31/2020 - 9/30/2021 Tecumseh-Infinity Medical	
		A-18		Receivables Fund LP Bank of America Statements	
				6/30/2020 - 9/30/2022 Tecumseh-Infinity Medical	
				Receivables Fund, LP Northbrook Bank & Trust Co.	
		. 10		Statements account ending 1991 (TEC003581 -	
		A-19		003657)	

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#### **EXHIBITS**

EXHIBITS		Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.			<b>BK</b> 21-14486-abl	
		HASelect v. Tecumseh			<b>Adv</b> 21-01167-abl	
Offered	Admitted	Identification		Description	Offers	
				•	Objections	
		-		_	Rulings	
		#	Witness		Exceptions	
		#	witness	D-fA A	Exceptions	
		A-20		BofA Account Tracing Analysis (TEC003658 - 003659)		
		A-20		Email re FW: DBA of Infinity Health Connections to		
				Bank of America Account - named Tecumseh-Infinity		
		A-21		Medical Receivables Fund		
		71 21		Email re [ENCRYPT] RE: DBA of Infinity Health		
				Connections to Bank of America Account - named		
		A-22		Tecumseh-Infinity Medical Receivables Fund		
				6/25/2020 Email from Oliver Hemmers to C. Meyer &		
				M. Belotz re Purchase Order Update (TEC003122 -		
		A-23		003123)		
				7/20/2020 Letter from Infinity to American Health		
				Imaging re pre-authorization for patient MRI without		
		A-24		Contrast (TEC0003187 - 003188)		
	<u> </u>					
				10/10/2020 Health Insurance Claim Form Benchmark		
		A-25		Physical Therapy (TEC0003189 - 003190)		
				10/20/2020 Email chain between Oliver Hemmers and		
		B-26		Mike Belotz re NAV (TEC0003443 - 003446)		
				2/17/2021 Order issued in Circuit Court of Cook		
				County, Illinois, Chancery Division Case No. 2020 CH		
		D 27		4427 Griffin Asset Management LLC et al. V.		
		B-27		Chadwick Meyer, et al. (TEC003450 - 003454)  Case Information Summary for Circuit Court of Cook		
				County, Illinois, Chancery Division Case No. 2020 CH		
				4427 Griffin Asset Management LLC et al. V.		
		B-28		Chadwick Meyer, et al. (TEC003455 - 003474)		
		D-20		6/30/2020 - 10/29/2021 Infinity Capital Management		
				Nevada State Bank statements Account No. ending		
		B-29		6375 (TEC007095 - 007160)		
		2 2)		(1200,000 00,100)		
		B-30		Investor Reports - Native Spreadsheets TEC003661B		
				Investor Reports - Native Spreadsheets (TEC003660 -		
		B-31		003661)		
		B-32		2020 Tax Filing		
				2021 Tax Filings (TEC003662 - 007066 (both 2020		
		B-33		and 2021)		
	<u> </u>			2/26/2019 HASelect Original Loan and Security		
		B-34		Agreement (TEC007167 - 007184)		
				12/18/2019 HASelect Second Amd & Rest Loan and		
		B-35		Security Agreement (TEC007185 - 007199)		
				9/6/2019 Email re wires (REV_00508184)		
		B-36		(TEC007200)		
		D 45		7/15/2021 Email re July reporting (REV_00002039)		
		B-37		(TEC007201 - 007203)		
		D 20		6/25/2021 Email re June collection wires released		
		B-38		(REV_00003245) *TEC007204 - 007207)		

# Case 21-01167-abl Doc 267 Entered 08/18/23 15:18:41 Page 6 of 13 DEFENDANT'S TRIAL EXHIBITS

	Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.  BK 21-14486-abl				
EXH	IIBITS			CAPITAL MANAGEMENT, INC.	
_			v. Tecumseh		<b>Adv</b> 21-01167-abl
Offered	red Admitted	I	dentification	Description	Offers
					Objections
					Rulings
		#	Witness		Exceptions
		π	Withess	10/29/2020 Email re Business Authorization & Cert	Exceptions
		B-39		(REV_00499718 – 00499719) (TEC007208 - 007210)	
		D-37		9/29/2021 Dkt. 47 Case No. 21-14486 Schedules	
		B-40		(REV 00532605) (TEC007211 - 007225)	
		D 40		3/23/2021 Email re wire into account	
		B-41		(REV 00504656) *TEC007226 - 007229)	
		D 11		12/23/2020 Patient Assignment (REV 00019347)	
		B-42		(TEC007230 - 007233)	
		D 12		1/17/2020 Business Associate Agreement	
		B-43		(REV_00058230) (TEC007234 - 007240)	
		<u> </u>		2/4/2021 Email re Funding Request (REV 00015212)	
		B-44		(TEC007241 - 007243)	
		2		2/4/2021 Infinity Authorization (REV 0015213)	
		B-45		(TEC007244)	
				2/26/2021 Health Insurance Claim Form – Shannon	
		B-46		Galbreath (TEC007245 - 007249)	
		-		3/22/2021 Payment to Provider (REV 00135414)	
		B-47		(TEC007250 - 007251)	
				9/7/2021 Email re Request for Payment	
		B-48		(REV 00000254) (TEC007252)	
				9/7/2021 Email re Request for Payment	
		B-49		(REV 00000254) (TEC007253)	
				1/7/2015 Service Agreement/Contract	
		B-50		(REV 00058232) (TEC007254 - 007258)	
		C51		4/16/2021 Invoice (REV_00502523) (TEC007259)	
				1/13/2021 Email re Infinity Report (REV_00512749)	
		C-52		(TEC007260 - 007262)	
				2/19/2021 Email re 4th Quarter Reconciliation	
		C-53		(REV_00013191) (TEC007263 - 007265)	
				7/15/2021 Email re July Funding Request #1	
		C-54		(REV_00134227 – 00134228) (TEC007266 - 007268)	
				7/13/2021 Email re Funds Needed for Bank	
		C-55		(REV_00513523 – 00513524) (TEC007269 - 007270)	
1				7/16/2021 Email from Jon Porter to Ann Pantelas re	
				update on HAS negotiations (REV_00002032)	
		C-56		(TEC007325 - 007326)	
				6/15/2021 Email from Oliver Hemmers to Will Martin	
				re reach out to Three Bell Capital (REV_00003975)	
		C-57		*TEC007327)	
				11/4/2020 Email re Tecumseh's dba & Supporting	
				Docs (REV_00499839 – 00499840) (TEC007328 -	
		C-58		007335)	
				10/29/2020 Email re seeking funds (REV_00499724)	
		C-59		(TEC007336 - 007338)	
				9/30/2020 Nevada State Bank Statement Tecumseh	
		G 60		Wire from NAV (21-01167-57-17) (TEC007339 -	
		C-60		007343)	

# Case 21-01167-abl Doc 267 Entered 08/18/23 15:18:41 Page 7 of 13 **DEFENDANT'S TRIAL EXHIBITS**

EXHIBITS		Case Title	<b>BK</b> 21-14486-abl		
EXE	HBITS	HASelect v. Tecumseh		·	Adv 21-01167-abl Offers
Offered	Admitted	Identification		Description	
					Objections
				-	Rulings
		ш	Witness		Ŭ
		#	Witness	10/30/2020 Nevada State Bank Statement Tecumseh	Exceptions
				Wire from NAV (21-01167-57-26) (TEC007344 -	
		C-61		007349)	
		C-01		7/15/2021 Email from Oliver Hemmers to Anne	
				Pantelas, and Igor Shleypak re July Reports	
		C-62		(REV 00002052) (TEC007354 - 007356)	
		0.2		4/8/2021 Infinity Health Insurance Form	
		C-63		(REV 00008378) (TEC007357 - 007362)	
				2/15/2021 Email from Renee Infinity Health to	
				dMorley@swanklawgroup.com re payment to provider	
		C-64		(REV_00013975) (TEC007363 - 007370)	
				1/9/2021 Health Insurance Claim Form Sandra Harris	
		C-65		(REV_00016608) (TEC007371 - 007376)	
				1/6/2021 Health Insurance Claims Form	
		C-66		(REV_00017218) (TEC007377 - 007379)	
		~		11/5/2020 Contract with Provider (REV_00017220)	
		C-67		(TEC007380 - 007382)	
				12/14/2020 Email from Renee Infinity Health to	
		C-68		Priscilla Espinosa re Request for Payment (REV 00020789) (TEC007383 - 007384)	
		C-08		11/30/2020 Infinity Authorization (REV 00022388)	
		C-69		(TEC007385)	
		C-09		11/6/2020 Patient Assignment (REV_00022507)	
		C-70		(TEC007386 - 007388)	
		C 70		11/11/2020 Email from Miranda Pope to Felecia	
				Infinity Health re Funding Request (REV 00024373)	
		C-71		(TEC007389 - 007394)	
				11/11/2020 Infinity's Authorization (REV 00024411)	
		C-72		(TEC007395)	
				11/2/2020 Email from Intake Infinity Health to	
				Referral@theinjuryspecialists.com &	
				support@theinjuryspecialists.com re Funding Request	
		C-73		(REV_00025630) (TEC007396 - 007397)	
				9/21/2020 Email from Felecia Infinity Health to Katie	
		0.74		Serzynsk, Kevin Collins & Amber Daniel re Funding	
		C-74		Request (REV_00030917) (TEC007398 - 007399)	
		C 75		9/21/2020 Infinity Authorization (REV_00030918) (TEC007400)	
		C-75		6/21/2020 Patient Assignment (REV 00039157)	
		D-76		(TEC007401 - 007403)	
		D 10		6/2/2020 Purchase & Sale Agreement – Preva	
		D-77		(REV 00041139) (TEC007404 - 007410)	
		2 //		3/17/2020 Infinity Service Agreement/Contract	
		D-78		(REV 00046940) (TEC007411 - 007415)	
$\overline{}$				9/20/2019 Purchase & Sale Agreement Cuevas	
		D-79		(REV 00070068) (TEC007430 - 007435)	

# Case 21-01167-abl Doc 267 Entered 08/18/23 15:18:41 Page 8 of 13 DEFENDANT'S TRIAL EXHIBITS

EXHIBITS		Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.			<b>BK</b> 21-14486-abl
EXH	HRLLS	HASelect v	. Tecumseh		<b>Adv</b> 21-01167-abl
Offered	Admitted	Identification		Description	Offers
				Description	<b>Objections</b>
				_	<b>-</b>
					Rulings
		#	Witness		Exceptions
		D 00		1/19/2021 Copy of Check #1627 (REV_00135227)	
		D-80		(TEC007436 - 007439)	
		D 01		1/19/2021 Payment to Provider (REV_00135228)	
		D-81		(TEC007440 - 007441) 12/22/2020 Copy of Check #1593 (REV 00136367)	
		D-82		(TEC007442)	
		D-62		12/22/2020 Payment to Provider (REV 00136368)	
		D-83		(TEC007443 - 007444)	
		D-03		3/17/2020 Infinity Service Agreement/Contract	
		D-84		(REV 00365990) (TEC007445 - 007449)	
				3/22/2021 Email from Anne Infinity Health to Mike	
				Belotz, Oliver Hemmers & Chad Meyer re Checking in	
		D-85		(REV 00504660) (TEC007450 - 007451)	
				10/28/2021 Dkt. Case No. 21-14486 Amended	
		D-86		Schedules (REV_00532606) (TEC007453 - 007459)	
				[DKT 35] Simon Henry Clark's Counterclaim and	
				Third-Party Complaint(United States District Court for	
				the Northern District of Illinois Easter Division – Case	
		D-87		No. 22-cv-04269) (TEC007460 - 007504)	
		D 00		September 30, 2020 Monthly Account Statement for	
		D-88		Infinity's Nevada State Bank account ending in 6375	
		D-89		September 30, 2020 Assignment and Bill of Sale for the 1-G Accounts	
		D-89		October 4, 2020 Assignment and Bill of Sale for the 1-	
		D-90		H Accounts	
		D 70		11 / recounts	
				October 30, 2020 Monthly Account Statement for	
		D-91		Infinity's Nevada State Bank account ending in 8420	
				July 11, 2020 Email from Mike Belotz to Endre, et al.	
		D-92		re Three Bell Capital	
				August 17, 2021 Email from Bill@ftm-Investments to	
				Mike Belotz and Ann Pantelas re Open Position	
		D-93		Reports with Attached Collections Report	
				Chadwick Meyer's Complaint for Declaratory,	
				Monetary and Other Relief (In the Circuit Court of	
		D 04		Cook County, Illinois, County Department, Cancery	
<b>-</b>		D-94		Division - Case No. 2019CHI4290) Form ADV - Annual Amendment - All Sections /	
		D 05			
		D-95	+	Griffin Asset Management LLC Form ADV - Other-Than-Annual Amendment / Griffin	
		D-96		Asset Management LLC	
		D-20		Form ADV - Annual Amendment - All Sections /	
		D-97		Griffin Asset Management LLC	
		~ / /		10/17/2019 Email from Oliver Hemmers to Debbie	
		D-98		Griffin & Endre Dobozy re Draw Request	
		J 70		Ginini & Endie Dobozy ie Diaw Request	<u> </u>

#### Case 21-01167-abl Doc 267 Entered 08/18/23 15:18:41 Page 9 of 13 **DEFENDANT'S TRIAL**

#### **EXHIBITS**

EXHIBITS		Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.			<b>BK</b> 21-14486-abl
		HASelect v. Tecumseh			<b>Adv</b> 21-01167-abl
Offered	Admitted	Identification		Description	Offers
				<u> </u>	Objections
		-		_	Rulings
		#	Witness		Exceptions
-		#	Withess	3/1/2020 email from Mike Belotz to Chad Meyer re	Exceptions
		D-99		FTM HA Agreement	
		D-77		3/9/2020 Email from Endre@ftm-investments.com to	
		D-100		Chad Meyer re Touching Base	
		2 100		3/28/2020 Email from Bill@ftm-investmenets.com re	
		E-101		Notes from the callcall	
				5/7/2020 Email from Endre@ftm-investments.com to	
		E-102		Chad Meyer RE_Quick question	
				6/17/2020 Email from Anne Pantelas to Chad Meyer,	
				Mike Belotz, Endre@ftm-investments.com, Bill@ftm-	
				investments.com, Oliver Hemmers & Simon Clark re	
		E-103		short agenda - How to	
				8/10/2020 Email from Bill@ftm-investments.com to	
				Chad Meyer and Mike Belotz RE_ Revised July	
		E-104		Report	
				8/12/220 Email from Bill@ftm-investments.com to	
				Mike Belotz, Chad Meyer and Li-Chiun Su RE_	
		E-105		Investor portfolio data	
				6/29/2020 Email from Anne Pantelas to ImanIqbai	
				LAS VEGAS NV, Oliver Hemmers, Chad Meyer FW_	
				DBA of Infinity Health Connections to Bank of	
		E-106		America Account - named Tecumseh-Infinity Medical Receivables Fund	
		E-106		11/23/2020 Email from Endre@ftm-investments.com	
				to Chad Meyer, Mike Belotz, Bill@ftm-	
				investments.com and Brenda Dalzell re Infinity Call	
		E-107		Update	
		L 107		3/5/2021 Email from maristela@infinitycapital.com to	
				Mike Belotz, bill@ftm-investments.com RE	
		E-108		Tecumseh - Finance Report October 2020	
				10/12/2021 Email from Oliver Hemmers to Mike	
		E-109		Belotz and Anne Pantelas re Tecumseh Termination	
		E-110		Signed TI-FTM Agreement dated 6/24/2020	
				HASelect's Financial Statements and Independent	
				Auditors' Report dated December	
		E-111		31, 2020	
				6/11/2020 Demand Letter from Attorney Michael L.	
		D 115		Gesas to Anne Pantelas [INFINITY	
		E-112		001436-001455]	
		E 112		Saul Ewing Anstein July 10, 2020, Letter w/o	
		E-113		attachment, July 10, 2020 [Infinity 000967-000971]	
				Infinity Capital Management, Inc. Financial Statements	
		E 114		- December 31, 2019 Infinity audit 12/31/2019 (2)	
		E-114		(TEC000357)	

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EXHIBITS		Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.			<b>BK</b> 21-14486-abl
		HASelect v. Tecumseh			<b>Adv</b> 21-01167-abl
Offered	Offered Admitted		dentification	Description	Offers
				Description	Objections
				_	v
					Rulings
		#	Witness		Exceptions
				HASELECT-FTM MEDICAL RECEIVABLES	
		E 115		LITIGATION FINANCE FUND SP, FEBRUARY 26,	
		E-115		2019 TO DECEMBER 31, 2019, AUDIT REPORT HASELECT-FTM MEDICAL RECEIVABLES	
				LITIGATION FINANCE FUND SP, DECEMBER 31,	
		E-116		2021, AUDIT REPORT	
		E-110		HASELECT-FTM MEDICAL RECEIVABLES	
				LITIGATION FINANCE FUND SP, DECEMBER 31,	
		E-117		2022, AUDIT REPORT	
		L-11/		Proof of Claim No. 8 dated 12/22/2021 (Case No. 21-	
				14486) – Creditor HASelect-Medical Receivables	
		E-118		Litigation Finance Fund International SP [ECF 65]	
		2 110		Griffin-ADV-2022-March-11 [E-mail dated 7/24/2023	
		E-119		from John Seem to MN re:	
				Griffin-ADV-2022-June-28 [E-mail dated 7/24/2023	
				from John Seem to Mike	
		E-120		Napoli re: Griffin's form ADV: email #2]	
				Griffin-ADV-2023-March-27 [E-mail dated 7/24/2023	
				from John Seem to Mike Napoli re: Griffin's form	
		E-121		ADV: email #2]	
				5/30/2020 Email from Mike Griffin to Oliver Hemmers	
				and Ann Pantelas with attached Notice of Default to	
		E-122		Infinity [Production of	
		E-123		Notice of Default to Infinity dated 5/30/2020	
				Griffin Asset Management LLC and HASELECT-	
				FTM Medical Receivables	
				Litigation Finance Fund SP, Complaint [Filed as	
				Exhibit 5 to ECF NO. 126, 21-	
		E-124		01167]	
		_		Resignation Letter, Alternative Investment Specialist	
		E-125		Ltd and FTM Ltd, Dated: June 7, 2020	
		L		2/22/2020 Email from Simon Clark to Mark Young, et	
		F-126		al. re Movin' On	
		E 105		11/21/2018 Email from Chad Meyer to Endre Meyer re	
		F-127		Follow ups	
		E 120		3/24/2020 Email from Endre to Chad Meyer and Mike	
		F-128		Belotz re Write-up for Infinity 4/9/2020 Email from Endre to Mike Belotz and Chad	
		F-129			
		Г-129		Meyer re NDA and signature page 4/14/2020 Email from Endre to Mike Belotz and Chad	
		F-130		Meyer re NDA and signature page	
		1:-130		4/18/2020 Email from Endre to Mike Belotz re	
		F-131		Updated proposal for Infinity	
		1 131		6/8/2020 Email from Endre to Chad Meyer and Mike	
		F-132		Belotz re HAselect-FTM Fund Update	
		- 132	1	1201012 10 111 1001000 1 1111 1 una Opanio	1

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EVIIIDIEG		Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.			<b>BK</b> 21-14486-abl	
EXHIBITS		HASelect v. Tecumseh			<b>Adv</b> 21-01167-abl	
Offered	Admitted	Identification		Description	Offers	
Officieu	1 Idillitted		dentification	Description		
				_	Objections	
					Rulings	
		#	Witness		Exceptions	
				8/10/2020 Email from bill@ftm-investments to Chad		
		F-133		Meyer and Mike Belotz re Revised July Report		
				8/12/2020 Email from bill@ftm-investments to MIke		
				Belotz, Chad Meyer and Li-Chiun Su re Investor		
		F-134		portfolio data		
		E 125		9/19/2020 Email from bill@ftm-investments to Chad		
		F-135		Meyer and Oliver Hemmers re UCC?  9/28/2020 Email from Endre to Chad Meyer, Mike		
				Belotz, bill@ftm-investments and Brenda Dalzell re		
		F-136		Conversation with Infinity		
		1130		2/25/2021 Email from Endre to Mike Belotz re 4th Q		
		F-137		reconciliation		
		1 13/		7/6/2021 Email from Oliver Hemmers to Jon Porter		
		F-138		and Will Martin re Loan Amount		
				7/16/201 Email from Anne Pantelas to Jon Porter re		
		F-139		Any updates on the HAS negotiations?		
		F-140		Infinity Capital Management Inc. Balance Sheet		
				7/7/2021 Email from Oliver Hememrs to Hedgact re		
		F-141		June 2021 Cash Application Reporting Inquiry		
				7/15/2021 Email from Oliver Hemmers to		
				Info@HedgAct re Follow Up on 6/24 email    Re: 2021		
				Updated Master Loan Agreement (MLA) Schedule of		
		F-142		FTM Note Balances		
				6/25/2021 Email from Oliver Hemmers to		
				Info@HedgeAct re Wires Released    Re: Please set up		
		F-143		June collection wires today (6/25)    Fwd: ShareFile		
		Γ-143		Activity Notification    \$125,909.70  3/23/2021 Email from Anne Infinity Health to Mike		
		F-144		Belotz and Chad Meyer re Checking in		
		1 177		Assignment of Benefits/Medical Lien and Security		
		F-145		Agreement dated 12/23/2020		
				2/4/2021 Email from Felicia Infinity Health to Miranda		
				Pope re Physician Followup Treatment Request –		
		F-146		Shannon Galbreath		
				2/4/2021 Ltr from Michelle Newcomb at Infinity		
				Health Connections to Non-Surgical Orthopedics, PC		
		F-147		re Scheduling (Shannon Galbreath)		
				Health Insurance Clam Form dated 2/26/2021 –		
		F-148		Shannon v. Galbreath		
				3/22/2021 Ltr from Michelle Newcomb at Infinity		
				Health Connections to Non-Surgical Orthopaedics PC		
				re Carolina Arciniegas, Caprice Banks, Shannon		
		F-149		Galbreath, Shirley McCarthy and Janell Washington		
				9/7/2021 Email from Felicia Infinity Health to Summer		
		F-150		Bressoud re Shannon Galbreath		

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EXHIBITS		Case Title	<b>BK</b> 21-14486-abl		
EXH	IIBITS	HASelect v. Tecumseh		<b>Adv</b> 21-01167-abl	
Offered	Admitted	Identification		Description	Offers
				Description	Objections
		-			Rulings
			XX 7* .		
		#	Witness	0/7/2021 F. 11.0 F.11.1 J. 7.1.1 J. 7.1.	Exceptions
		0.151		9/7/2021 Email from Felicia Infinity Health to Summer	
		G-151		Bressoud re Shannon Galbreath	
				1/7/2015 Service Agreement/Contract between Non-	
		C 152		Surgical Orthopaedics PC and The Center for Spine	
		G-152		Procedures	
		C 152		Invoice to Tecumseh-Infinity MRF for Acquisition Fee	
		G-153		for AR purchases up to 04.16.21	
		G 154		June 2021 Deposit Summary Report - Tecumseh-	
		G-154		Infinity Medical Receivables	
		0.155		Deposit Summary Report - Tecumseh-Infinity Medical	
		G-155		Receivables	
		G-156		Benchmark Physical Therapy Statement	
		G 155		The Physicians Spine & Rehabilitaton Specialists of	
		G-157		Georgia Statement	
				1/13/2021 Email from Oliver Hemmers to	
		G 150		Info@HedgeAct re HedgeACT Fund    December 2020	
		G-158		Payments    Unresolved items	
		G-159		BofA Transaction Screenshot	
		G 160		2/19/2021 Email from Oliver Hemmers to Mike Belotz	
		G-160		re 4th Quarter Reconciliation	
		G 161		7/15/2021 Email from bill@ftm-investments to Mike	
		G-161		Belotz re July Funding Request #1	
				7/13/2021 Email from Oliver Hemmers to bill@ftm-	
		G-162		investments re Funds needed for Bank	
		G 162		6/15/2021 Email from Oliver Hemmers to Will Martin	
		G-163		re Update	
		G 164		10/29/2020 Email from Anne Pantelas to Chad Meyer	
		G-164		re Bank Transfer	
				6/27/2019 Service Agreement/Contract between Center	
		0.165		for Spine & Pain Medicine PC and Infinity Capital	
		G-165		Management/Infinity Health Connections.	
		G-166		List of Receivables for Funding Draw HAS-22	
		0.167		1/1/2018 - 12/31/2018 Income Statement - Infinity	
		G-167		Capital Management, Inc. 12/12/2018 Email from Oliver Hemmers to Chad	
		C 160			
		G-168		Meyer re Blanket lien draft 6/15/2021 Email from Mike Belotz to Oliver Hemmers	
		C 160		re Receivable data	
		G-169		Minutes of Conference call held on 4/28/2021	
		G-170			
		G-171		Minutes of Conference call held on 5/26/2021	
		G-172		Minutes of Conference call held on 6/9/2021	
		C 172		Balance Sheet - Tecumseh-Infinity- Accrual Basis as	
		G-173		of 12/31/2021 6/12/2020 Email from Simon Clark to Oliver Hemmers	
		C 174			
		G-174		and Anne Pantelas re Final decision	

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EXH	EXHIBITS		Case Title In re: INFINITY CAPITAL MANAGEMENT, INC.		
	HBITS	HASelect v. Tecumseh			<b>Adv</b> 21-01167-abl
Offered	Admitted	Identification		Description	Offers
				•	Objections
				_	Rulings
			XX7.4		Ü
		#	Witness		Exceptions
				8/10/2020 Email from Anne Pantelas to Mike Belotz	
				and Oliver Hemmers re Some potential good news and	
		G-175		update on housekeeping items for the BOA account	
				5/15/2019 E-mail from Oliver Hemmers to	
		H-176		Info@HedgeAct re Draw Request HAS-4	
		H-177		Draw HAS-4 (REV 00489523)	
				6/19/2019 E-mail from Oliver Hemmers to	
				Info@HedgeAct, bill@ftm-investments & endre@ftm-	
i		H-178		investments re Draw Request HAS-5	
		H-179		Draw HAS-5 (REV 00490066)	
				7/17/2019 E-mail from Oliver Hemmers to	
				Info@HedgeAct, endre@ftm-investments.com &	
		H-180		Compliance re Draw Request HAS-6	
		H-181		Draw HAS-6 (REV 00490706)	
		11 101		8/20/2019 E-mail from Oliver Hemmers to Debbie	
		H-182		Griffin & Simon Clark re Draw Request HAS-9	
		H-183		Draw HAS-9 (REV 00491512)	
		11 103		11/12/2019 E-mail from Oliver Hemmers to	
				Info@HedgeAct & Simon Clark re Draw Request HAS	
		H-184		13	
		H-185		Draw HAS-13 (REV_00492726)	
		11 105		12/9/2019 E-mail from Oliver Hemmers to	
				Info@HedgeAct & Simon Clark re Draw Request HAS	
		H-186		14	
		H-187		Draw HAS-14 (REV 00493339)	
		11 10,		11/5/2019 E-mail from Oliver Hemmers to Debbie	
		H-188		Griffin & Simon Clark re Draw Request HAS-15	
		H-189		Draw HAS-15 (REV 00487540)	
		11 10)		4/27/2020 E-mail from Oliver Hemmers to	
				Info@HedgeAct & Mike Griffin re Draw Request HAS	
		H-190		22	
		H-191		Draw HAS-22 (REV 00495922)	
		H-192		TIFDumpWithIncome-Final BOA Sort	
+		11 1/2		Tecumseh – Infinity MR Fund - List of Receivables for	
				Series-1/Intake F (Batch 6, 7 & 8) PO#1-F-9-15	
		H-193		(TEC007272 - 007280)	
+		11 1/3		Tecumseh – Infinity MR Fund - List of Receivables for	
				Series-1/Intake I (Batch 12 A & B) PO# 1-I-10-18	
		H-194		(TEC007302 - 007306	
+		11-12-		Tecumseh – Infinity MR Fund - List of Receivables for	
				Series-1/Intake J (Batch 14-A) PO# 1-J-10-19	
		H-195		(TEC007308)	
<del></del>		11-173		Email from Mike Belotz re December Purchase Orders	
,		H-196		(TEC000369 - 000374)	